LPDES PERMIT NO. LA0005746, AI No. 2706

LPDES STATEMENT OF BASIS
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA

I. Company/Facility Name: Chemtura Corporation
Chemtura Taft Facility
471 Highway 3142
Hahnville, Louisiana 70057

II. Issuing Office: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

III. Prepared By: Jenniffer Sheppard
Industrial Permits Section
Water Permits Division
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Date Prepared: January 28, 2008

IV. Permit Action/Status:

A. Reason For Permit Action:

Proposed reissuance of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46.

* In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

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C. LPDES permit - Chemtura Taft Facility (LA0005746)
LPDES permit effective date: March 1, 2003
LPDES permit expiration date: February 28, 2008

Shell Chemical Company (LA0079332) - to be merged with Chemtura and terminated upon issuance of this permit.
LPDES permit effective date: August 1, 1998
LPDES permit expiration date: July 31, 2003

D. Application received on August 4, 2007. Additional information received on September 5, 2007, November 28, 2007, and by phone on January 24, 2008. E-mail correspondence dated/received on March 4, 2008 and March 5, 2008.

V. Facility Information:

A. Location - 471 Highway 3142 in Hahnville

B. Applicant Activity

According to the application, Chemtura Corporation, Chemtura Taft Facility, is a polymer additives manufacturing facility. Products manufactured include Epoxidized soybean oils, PVC stabilizers and Mixed Metals heat stabilizers as chemical intermediates used to maintain the durability and longevity of PVC pipe, fencing, and other plastic products.

Chemtura recently purchased the Shell Chemical Taft Plant with LPDES Permit #LA0079332 and requested to combine and eliminate outfalls from LPDES Permit #LA0079332 with Chemtura permitted outfalls in LPDES Permit #LA0005746. Upon reissuance of LA0005746, LPDES Permit LA0079332 is proposed to be terminated.

Process wastewaters from the production units are not discharged to waters of the state. These wastewaters are disposed of using two underground injection wells. However, Chemtura has requested authorization to discharge process area stormwater through Outfall 001 upon installation of the Contact Stormwater Treatment Unit. The process area stormwater will be subject to the OCPSF Guidelines at 40 CFR 414, Subpart D, for the Thermoplastics Resins Subcategory and Subpart J for direct discharge points sources that do not use end-of-pipe biological treatment.

C. Technology Basis - (40 CFR Chapter 1, Subchapter N/Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903)

Guideline	Reference
Organic Chemicals, Plastics, and Synthetic Fibers - Thermoplastic Resins	40 CFR 414, Subparts D and J

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Other sources of technology based limits:
LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).
Louisiana Water Quality Management Plan for Sanitary Dischargers.
LDEQ Sanitary General Permits
LDEQ Light Commercial General Permits
Best Professional Judgment

D. Fee Rate -
1. Fee Rating Facility Type: minor
2. Complexity Type: III, BPJ from a complexity of VI to a III due to process discharges (with exception of process area stormwater) being deep well injected.
3. Wastewater Type: II
4. SIC code: 2869

E. Continuous Facility Effluent Flow - 0.094 MGD.

VI. Receiving Waters: Mississippi River (Outfall 001), and Eighty Arpent Canal via an unnamed drainage ditch (Outfalls 002, 003, and 004)

Mississippi River (Outfall 001), Segment No. 070301
1. River Basin: Mississippi River
2. Designated Uses:
The designated uses are primary contact recreation, secondary contact recreation, fish and wildlife propagation, and drinking water supply.

Eighty Arpent Canal via an unnamed drainage ditch (Outfalls 002, 003, and 004), Subsegment 020202
1. River Basin: Barataria
2. Designated Uses:
The designated uses are primary contact recreation, secondary contact recreation, and fish and wildlife propagation.

VII. Outfall Information:

Outfall 001

A. Type of wastewater - the discharge of treated process area stormwater, contact stormwater, and previously monitored sanitary wastewater from Internal Outfall 102.

B. Location - at the point of discharge from the Contact Stormwater Treatment Unit, prior to commingling with other waters and discharging into the Mississippi River, at Latitude 29°58'52", Longitude 90°27'17".

C. Treatment - treatment of process area stormwater consists of:
- stormwater surge tanks
- clarification

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D. Flow - Intermittent, (estimated flow) 0.0292 MGD.

Process Area Stormwater	0.0252 MGD
Sanitary Wastewater (Internal Outfall 102)	0.0040 MGD

E. Receiving waters - Mississippi River

F. Basin and segment - Mississippi River, Segment 070301.

Internal Outfall 102

A. Type of wastewater - the discharge of treated sanitary wastewater.

B. Location - at the point of discharge from the sanitary treatment facility prior to combining with the waters of Final Outfall 001, at Latitude 29°58'50", Longitude 90°27'15".

C. Treatment - treatment of sanitary wastewaters consists of:
- package treatment plant

D. Flow - Intermittent, (estimated flow) 0.004 MGD.

E. Receiving waters - Mississippi River via Final Outfall 001.

F. Basin and segment - Mississippi River Basin, Segment 070301.

Outfall 002

A. Type of wastewater - the discharge of boiler blowdown, cooling tower blowdown, steam condensate, and low contamination potential stormwater runoff from the east side of the facility.

B. Location - at the point of discharge from the east ditch weir prior to mixing with any other waters, at Latitude 29°58'51", Longitude 90°27'11".

C. Treatment - None

D. Flow - Continuous, (estimated flow) 0.094 MGD.

E. Receiving waters - Eighty Arpent Canal via an unnamed drainage ditch

F. Basin and segment - Barataria Basin, Segment 020202

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Outfall 003

A. Type of wastewater - the discharge of low contamination potential stormwater runoff from the west side of the facility and deminimus amounts of steam condensate, air conditioning condensate, and domestic well water for firewater pump/line flushing.

B. Location - at the point of discharge from the west ditch weir, prior to combining with any other waters, at Latitude 29°58'51", Longitude 90°27'11".

C. Treatment - None

D. Flow - Intermittent, (estimated flow) 0.250 MGD.

E. Receiving waters - Eighty Arpent Canal via an unnamed drainage ditch

F. Basin and segment - Barataria Basin, Segment 020202

Outfall 004

A. Type of wastewater - the discharge of low contamination potential stormwater runoff from the front of the facility which includes the main office building area, an asphalt parking lot, the grassy areas located towards the west of the facility, and stormwater from the injection well area.

B. Location - at the point of discharge into the open ditch on the south side of the facility, prior to combining with any other waters, at Latitude 29°58'44", Longitude 90°27'09".

C. Treatment - None

D. Flow - Intermittent, (estimated flow) 0.0475 MGD.

E. Receiving waters - Eighty Arpent Canal via an unnamed drainage ditch.

F. Basin and segment - Barataria Basin, Segment 020202

VIII. Proposed Permit Limits:

The specific effluent limitations and/or conditions will be found in the draft permit. Development and calculation of permit limits are detailed in the Permit Limit Rationale section below.

Summary of Proposed Changes From the Current LPDES Permit:

A. Chemtura recently purchased the Shell Chemical Taft Plant with LPDES Permit #LA0079332 and requested to combine and eliminate outfalls from LPDES Permit #LA0079332 with Chemtura permitted outfalls in LPDES Permit #LA0005746. Upon reissuance of LA0005746, LPDES Permit LA0079332 is proposed to be terminated.

SHELL CHEMICAL OUTFALL (LA00079332) (Former LPDES Permit, LA0079332, effective on August 1, 1998)	**CHEMTURA OUTFALL (LA0005746)** (Current LPDES permit, LA0005746, effective on March 1, 2003)	**CHEMTURA OUTFALL (LA0005746)** (Proposed new LPDES outfall number)
001	---	003 (*)
002	---	001
102	---	102
---	002	002
---	003	003 (*)
---	---	004 (newly created)

(*) Shell Chemical's Outfall 001 has been combined with the discharges from Chemtura's Outfall 003 and collectively named Outfall 003 in the proposed draft permit.

Shell Chemical's Outfall 002 has been renamed as Outfall 001 in the proposed draft permit.

Shell Chemical's Internal Outfall 102 has been retained. This will discharge through Final Outfall 001.

Chemtura's Outfall 002 will also be retained.

Outfall 004 is newly created.

B. Outfall 001 - the process area stormwater discharges from this outfall are regulated under the OCPSF Guidelines at 40 CFR, Part 414 (Subparts D and J). This Office has determined that it is appropriate to apply these limitations as concentrations instead of mass due to the intermittent nature of stormwater discharges. The sampling frequencies for BOD_5 and TSS have been established at 1/month based on best professional judgment. The sampling frequencies for the volatile compounds, acid compounds, and base neutral compounds have been retained at 1/year from the former LPDES permit (LA0079332) issued to Shell Chemical, effective August 1, 1998.

C. Outfall 001 - A daily maximum limitation 15 mg/L for Oil & Grease, monthly average and daily maximum reporting requirements for Flow, and pH of 6.0 to 9.0 (s.u.) have been established at a frequency of 1/month. These limitations/monitoring requirements have been applied based on best professional judgment.

D. Internal Outfall 102 - The monthly average limitation of 200 colonies per 100 ml is newly established, whereas the weekly average limitation of 400 colonies per 100 ml has been retained from the LPDES permit, LA0079332, effective August 1, 1998. These limitations are

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applied based on best professional judgment and in accordance with the Statewide Sanitary Effluent Limitations Policy for Mississippi River dischargers.

E. Outfall 002 - A daily maximum report only requirement for temperature (°F) and a daily maximum limitation of 0.2 mg/L for Total Residual Chlorine has been established based on best professional judgment and in accordance with the requirements of the Light Commercial General Permit, LAG480000 (Schedule F, for cooling tower blowdown and boiler blowdown discharges). A monitoring frequency of 1/week for this parameter is consistent with other frequencies established for this outfall in the current LPDES permit, effective on March 1, 2003.

F. Outfall 004 - Newly created outfall that discharges low contamination potential stormwater runoff from the front of the facility which includes the main office building area, an asphalt parking lot, the grassy areas located towards the west of the facility, and stormwater from the injection well area. Daily maximum limitations of 50 mg/L for TOC and 15 mg/L for Oil & Grease have been established. Monthly Average and Daily Maximum reporting for flow (MGD) has also been established. The limitations/monitoring requirements are consistent with current stormwater guidance for industrial facilities. A sampling frequency of 1/quarter has been established for these parameters. This frequency is consistent with the frequencies established in the Multi-Sector General Permit, LAR050000.

G. Outfall 004 - pH limitations of 6.0 to 9.5 (s.u.) have been established based on a request from Chemtura. These request is consistent with limitations previously established for Outfalls 002 and 003 and has been applied based on best professional judgment. A sampling frequency of 1/quarter has also been established for this parameter. This frequency is consistent with the frequencies established in the Multi-Sector General Permit, LAR050000.

IX. Permit Limit Rationale:

Regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44(a) require technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ (best professional judgment) in the absence of guidelines, or on a combination of the two. The following is a rationale for types of wastewaters. See outfall information descriptions for associated outfall(s) in Section VII.

1. Outfalls 001 - Process Wastewaters

***Outfall 001** - the discharge of treated process area stormwater, contact stormwater, and previously monitored sanitary wastewater from Internal Outfall 102.

Chemtura Corporation, Chemtura Taft Facility is subject to Best Practicable Control Technology Currently Available (BPT) and Best Available Technology Economically Achievable (BAT) effluent limitation guidelines listed below:

Manufacturing Operation	Guideline
Organic chemical manufacturing Thermoplastic Resins	40 CFR 414, Subparts D and J.

PARAMETER	MONTHLY AVERAGE ug/L	DAILY MAXIMUM ug/L	MONITORING FREQUENCY
Flow (MGD)	Report	Report	1/month
pH (standard units)	6.0	9.0	1/month
BOD_5	24 mg/L	64 mg/L	1/month
TSS	40 mg/L	130 mg/L	1/month
Oil & Grease	---	15 mg/L	1/month
Acrylonitrile	94	232	1/year
Benzene	57	134	1/year
Carbon Tetrachloride	142	380	1/year
Chlorobenzene	142	380	1/year
Chloroethane	110	295	1/year
Chloroform	111	325	1/year
1,1-Dichloroethane	22	59	1/year
1,2-Dichloroethane	180	574	1/year
1,1-Dichloroethylene	22	60	1/year
1,2-trans-Dichloroethylene	25	66	1/year
1,2-Dichloropropane	196	794	1/year
1,3-Dichloropropylene	196	794	1/year
Ethylbenzene	142	380	1/year
Methyl Chloride	110	295	1/year
Methylene Chloride	36	170	1/year
Tetrachloroethylene	52	164	1/year
Toluene	28	74	1/year
1,1,1-Trichloroethane	22	59	1/year
1,1,2-Trichloroethane	32	127	1/year

PARAMETER	MONTHLY AVERAGE ug/L	DAILY MAXIMUM ug/L	MONITORING FREQUENCY
Trichloroethylene	26	69	1/year
Vinyl Chloride	97	172	1/year
2,4-Dimethylphenol	19	47	1/year
4,6-Dinitro-o-cresol	78	277	1/year
2,4-Dinitrophenol	1207	4291	1/year
2-Nitrophenol	65	231	1/year
4-Nitrophenol	162	576	1/year
Phenol	19	47	1/year
Acenaphthene	19	47	1/year
Acenaphthylene	19	47	1/year
Anthracene	19	47	1/year
Benzo(a)anthracene	19	47	1/year
Benzo(a)pyrene	20	48	1/year
3,4-Benzofluoranthene	20	48	1/year
Benzo(k)fluoranthene	19	47	1/year
Bis(2-ethylhexyl)phthalate	95	258	1/year
Chrysene	19	47	1/year
1,2-Dichlorobenzene	196	794	1/year
1,3-Dichlorobenzene	142	380	1/year
1,4-Dichlorobenzene	142	380	1/year
Diethyl phthalate	46	113	1/year
Dimethyl phthalate	19	47	1/year
Di-n-butyl phthalate	20	43	1/year
Fluoranthene	22	54	1/year

PARAMETER	MONTHLY AVERAGE ug/L	DAILY MAXIMUM ug/L	MONITORING FREQUENCY
Fluorene	19	47	1/year
Hexachlorobenzene	196	794	1/year
Hexachlorobutadiene	142	380	1/year
Hexachloroethane	196	794	1/year
Naphthalene	19	47	1/year
Nitrobenzene	2237	6402	1/year
Phenanthrene	19	47	1/year
Pyrene	20	48	1/year
1,2,4-Trichlorobenzene	196	794	1/year

Site-Specific Consideration(s) for Outfall 001

Flow - established in accordance with LAC 33:IX.2707.I.1.b. A sampling frequency of 1/month has been established for flow and applied based on best professional judgment.

PH - established in accordance with LAC 33:IX.1113.C.1. A sampling frequency of 1/month has been established for pH and applied based on best professional judgment.

BOD_5 and TSS - monthly average and daily maximum limitations established in accordance with OCPSF Guidelines under 40 CFR 414, Subpart D for the Thermoplastic Resins Subcategory, and are applied based on best professional judgment. A frequency of 1/month has also been established based on best professional judgment.

Oil & Grease - Daily maximum limitation of 15 mg/L has been established at a frequency of 1/month. The limitation is consistent with current stormwater guidance for industrial facilities and the Multi-Sector General Permit, LAR050000. The monitoring frequency has been established at 1/month to be consistent with the frequencies established for other conventional and non-conventional parameters at this outfall and has been applied based on best professional judgment

Acrylonitrile, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroethane, Chloroform, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,1-Dichloroethylene, 1,2-trans-Dichloroethylene, 1,2-Dichloropropane, 1,3-Dichloropropylene, Ethylbenzene, Methyl Chloride, Methylene Chloride, Tetrachloroethylene, Toluene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, Trichloroethylene, Vinyl Chloride, 2,4-Dimethylphenol, 4,6-Dinitro-o-cresol, 2,4-Dinitrophenol, 2-Nitrophenol, 4-Nitrophenol, Phenol, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, 3,4-Benzofluoranthene, Benzo(k)fluoranthene, Bis(2-ethylhexyl)phthalate, Chrysene, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, Diethyl phthalate, Dimethyl phthalate, Di-n-butyl phthalate, Fluoranthene, Fluorene, Hexachlorobutadiene, Hexachloroethane, Naphthalene, Nitrobenzene, Phenanthrene, Pyrene, 1,2,4-Trichlorobenzene - limitations established in accordance with OCPSF Guidelines under 40 CFR 414, Subpart J for direct discharge point sources that do not use end-of-pipe biological treatment. A monitoring frequency of 1/year has been retained from LPDES Permit LA0079332 (Outfall 002), effective on August 1, 1998. This frequency is appropriate since these pollutants are not expected to be on site.

***Internal Outfall 102** - the discharge of treated sanitary wastewater.

Sanitary wastewaters (internal or external) are regulated in accordance with LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Areawide Sanitary Effluent Limits Policy and the Statewide Sanitary Effluent Limits Policy, as applicable. Concentration limits are used in accordance with LAC 33:IX.2707.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD_5 and TSS in terms of concentration.

PARAMETER	**MONTHLY AVERAGE MG/L**	**WEEKLY AVERAGE MG/L**	**MONITORING FREQUENCY**
Flow (MGD)	Report	Report	1/6 months
Fecal Coliform colonies/100 ml	200	400	1/6 months

Site-Specific Consideration(s) for Outfall 102

Flow - established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be monitored 1/6 months. The monitor and report requirement and monitoring frequency of 1/6 months have been retained from LPDES Permit LA0079332, effective on August 1, 1998, and are consistent with similarly permitted industrial facilities.

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Fecal Coliform - a monthly average limitation of 200 colonies per 100 ml is newly established, whereas the weekly average limitation of 400 colonies per 100 ml has been retained from the LPDES permit, LA0079332, effective August 1, 1998. These limitations are applied based on best professional judgment and in accordance with the Statewide Sanitary Effluent Limitations Policy for Mississippi River dischargers. The monitoring frequency has been established at 1/6 months based on best professional judgment and similarly permitted industrial facilities.

2. Outfall 002 - Utility Wastewaters & Stormwater

*Outfall 002 - the discharge of boiler blowdown, cooling tower blowdown, steam condensate, and low contamination potential stormwater runoff from the east side of the facility.

Utility wastewaters commingled with stormwater, being discharged to discrete outfalls receive BPJ limitations/monitoring requirements according to the following schedule:

PARAMETER	**MONTHLY AVERAGE MG/L**	**DAILY MAXIMUM MG/L**	**MONITORING FREQUENCY**
Flow (MGD)	Report	Report	Continuous Recorder
pH	6.0	9.5	Continuous Recorder (ph excursion requirements)
Temperature (°F)	---	Report	1/week
TOC	---	50	1/week
Oil & Grease	---	15	1/week
Total Residual Chlorine	---	0.2	1/week

Site-Specific Consideration(s) for Outfall 002

Flow - established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be monitored continuously. This requirement has been retained from the current LPDES permit, effective on March 1, 2003.

PH - established in accordance with LAC 33:IX.1113.C.1. Ph has been established at 6.0 to 9.5 s.u. and shall be monitored continuously. This requirement has been retained from the current LPDES permit LA0005746 (Outfall 002), effective on March 1, 2003.

Temperature (°F) and Total Residual Chlorine - monitoring requirements/limitations have been established based on best professional judgment and in accordance with the requirements of the Light Commercial General Permit, LAG480000 (Schedule F, for cooling tower blowdown and boiler blowdown). A monitoring frequency of 1/week for this parameter is consistent with other frequencies established for this outfall in the current LPDES permit, effective on March 1, 2003.

TOC and Oil & Grease - these requirements and monitoring frequencies have been retained from the current LPDES permit, effective on March 1, 2003.

3. Outfall(s) 003 and 004 - Stormwater

***Outfall 003** - the intermittent discharge of low contamination potential stormwater runoff from the west side of the facility and deminimus amounts of steam condensate, air conditioning condensate, and domestic well water for firewater pump/line flushing.

Uncontaminated or low potential contaminated stormwater discharged through discrete outfall(s) not associated with process wastewater shall receive the following BPJ limitations in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

PARAMETER	MONTHLY AVERAGE MG/L	DAILY MAXIMUM MG/L	MONITORING FREQUENCY
Flow (MGD)	Report	Report	1/quarter
TOC	---	50	1/quarter
Oil & Grease	---	15	1/quarter
pH (s.u.)	6.0	9.5	1/quarter

Site-Specific Consideration(s) for Outfall 003

Flow - established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be monitored 1/quarter. These requirements have been retained from the current LPDES permit, effective on March 1, 2003 and are consistent with current stormwater guidance for industrial facilities and the Multi-Sector General Permit, LAR050000.

PH - established in accordance with LAC 33:IX.1113.C.1. Ph has been established at 6.0 to 9.5 s.u. and shall be monitored 1/quarter. These limitations have been retained from the current LPDES permit, effective on March 1, 2003. The monitoring frequency is also retained from the current LPDES permit and is consistent with current stormwater guidance for industrial facilities and the Multi-Sector General Permit, LAR050000.

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TOC and Oil & Grease - these requirements and monitoring frequencies have been retained from the current LPDES permit, effective on March 1, 2003 These requirements have been retained from the current LPDES permit, effective on March 1, 2003 and are consistent with current stormwater guidance for industrial facilities and the Multi-Sector General Permit, LAR050000.

***Outfall 004** - the intermittent discharge of low contamination potential stormwater runoff from the front of the facility which includes the main office building area, an asphalt parking lot, the grassy areas located towards the west of the facility, and stormwater from the injection well area.

Uncontaminated or low potential contaminated stormwater discharged through discrete outfall(s) not associated with process wastewater shall receive the following BPJ limitations in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6). If a potential exists for a toxic parameter to be discharged through a stormwater outfall, then that toxic parameter shall receive a BPJ limitation based on the OCPSF guidelines 40 CFR 414, Subpart J.

PARAMETER	**MONTHLY AVERAGE ug/L**	**DAILY MAXIMUM ug/L**	**MONITORING FREQUENCY**
Flow (MGD)	Report	Report	1/quarter
pH (standard units)	6.0	9.5	1/quarter
TOC	---	50 mg/L	1/quarter
Oil & Grease	---	15 mg/L	1/quarter

Site-Specific Consideration(s) for Outfall 004

Flow - established in accordance with LAC 33:IX.2707.I.1.b. A sampling frequency of 1/quarter has been established for flow based on best professional judgment, similarly permitted industrial discharges, and the Multi-Sector General Permit, LAR050000.

PH - established in accordance with LAC 33:IX.1113.C.1. Ph has been established at 6.0 to 9.5 s.u. and shall be monitored 1/quarter. These limitations are consistent with limitations established for Outfalls 002 and 003 in the current LPDES permit, effective on March 1, 2003. The monitoring frequency is also consistent with current stormwater guidance for industrial facilities and the Multi-Sector General Permit, LAR050000.

TOC and Oil & Grease - Daily maximum limitations of 50 mg/L for TOC and 15 mg/L for Oil & Grease have been established. The limitations are consistent with current stormwater guidance for industrial facilities. A sampling frequency of 1/quarter has been established for these parameters based on best professional judgment,

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similarly permitted industrial discharges, and the Multi-Sector General Permit, LAR050000.

General Requirement for all Stormwater Outfalls

In accordance with LAC 33:IX.2707.I.3 and [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

WATER QUALITY-BASED EFFLUENT LIMITATIONS

The following pollutants received water quality based effluent limits:

PARAMETER(S)
None

Minimum quantification levels (MQL's) for state water quality numerical standards-based effluent limitations are set at the values listed in the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, September 27, 2001. They are also listed in Part II of the permit.

TMDL Waterbodies

Outfall 001

The discharges from Outfall 001 including treated process area stormwater, contact stormwater, and previously monitored sanitary wastewater from Internal Outfall 102 are to Mississippi River, Segment No. 070301. The Mississippi River is not listed on the Final 2006 Integrated Report as being impaired. Therefore, no additional requirements have been established in this permit.

Outfalls 002, 003, and 004

The discharges from Outfalls 002 includes boiler blowdown, cooling tower blowdown, steam condensate, and low contamination potential stormwater runoff from the east side of the facility. Outfall 003 includes low contamination potential stormwater runoff from the west side of the facility and deminimus amounts of steam, air conditioning condensate, and

domestic well water for firewater pump/line flushing. Outfall 004 includes low contamination potential stormwater runoff from the front of the facility which includes the main office building area, an asphalt parking lot, the grassy areas located towards the west of the facility, and stormwater from the injection well area. All three outfalls discharge to Eighty Arpent Canal via an unnamed drainage ditch, Segment No. 020202. Eighty Arpent Canal is listed in the Final 2006 Integrated Report as being impaired with non-native aquatic plants and dissolved oxygen.

Non-Native Aquatic Plants
Non-native aquatic plants are introduced into a waterbody through discharges such as ship ballast water, where the ballast water originates from a different areas/waterbody. Since Outfalls 002, 003, and 004 do not contain wastewaters that are originate from other areas/waterbodies, LDEQ has determined there is no potential to cause further impairments to the receiving water body. Therefore, no additional requirements were added to this permit as a result of the non-native aquatic plant impairment.

Dissolved Oxygen
TOC is a means of measuring organic materials in a discharge. A daily maximum limit of 50 mg/L TOC is imposed at the commingled utility and stormwater Outfalls 002, 003 and 004. These limitations are consistent with the limits established in LDEQ's General Permits for similar discharges and have been determined to be protective of the receiving waterbody.

Site-Specific Consideration(s)

None

X. Compliance History/DMR Review:

A compliance history/DMR review was done covering the period of January 2005 to January 2008.

A. DMR Excursions Reported

DATE	PARAMETER	OUTFALL	REPORTED VALUE	PERMIT LIMITS
07/01/05	TOC	003	value not reported due to lab contamination	50 mg/L, daily maximum
08/01/05	TOC	002	value not reported due to lab contamination	50 mg/L, daily maximum
09/01/05	pH	002	no sample taken due to Hurricane Katrina	6.0 to 9.0 s.u., continuous monitoring
09/01/05	Oil & Grease	002	no sample taken due to Hurricane Katrina	15 mg/L, daily maximum
09/01/05	TOC	002	no sample taken due to Hurricane Katrina	50 mg/L, daily maximum

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DATE	PARAMETER	OUTFALL	REPORTED VALUE	PERMIT LIMITS
11/01/05	ph	002	9.52 s.u., daily maximum	9.5 s.u., daily maximum
08/01/07	TOC	002	142.0 mg/L, daily maximum (*)	50 mg/L, daily maximum

(*) Company investigation found that the sample tube had been dropped below the normal sample pick up point to the bottom of the outfall basin and consequentially, contaminated with sand, silt, leaves, and algae. Therefore, this sample was not representative of the discharge.

B. Inspections - A facility inspection was conducted on September 6, 2007. The inspector did not note any areas of concern.

C. Compliance History - None

XI. "IT" Questions - Applicant's Responses

Chemtura Taft is a minor facility, therefore, IT Questions were not required to be submitted.

XII. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020202 of the Barataria Basin (Outfalls 002, 003, and 004) is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS).

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin (Outfall 001) has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. The draft permit has been submitted to the FWS for review in accordance with a letter dated 10/24/07 from Boggs (FWS) to Brown (LDEQ) and is pending FWS approval. Any comments made by FWS will be addressed as part of the response to comments/other changes section in the cover letter of the final permit.

Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

XIII. Historic Sites:

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XIV. Tentative Determination:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to permit for the discharge described in the application.

XV. Variances:

No requests for variances have been received by this Office.

XVI. Public Notices:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List